

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Jared Goyette, Craig Lassig, Michael Shum, Katie Nelson, Tannen Maury, Stephen Maturen, and The Communications Workers of America, *on behalf of themselves and other similarly situated individuals,*

Plaintiffs,

v.

Court File No.:
0:20-cv-01302 (WMW/DTS)

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his individual and official capacity*; Minneapolis Police Lieutenant Robert Kroll, *in his individual and official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his individual and official capacity*; Minnesota State Patrol Colonel Matthew Langer, *in his individual and official capacity*; and John Does 1-10, *in their individual and official capacities,*

Defendants.

DECLARATION OF ISABELLA SALOMÃO NASCIMENTO

My name is Isabella Salomão Nascimento. I declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. On April 14, 2021, I submitted a second declaration in support of Plaintiffs' renewed motion for temporary restraining order. (Dkt. 98.) Upon review of the Memorandum of Law In Support of Motion for Temporary Restraining Order (Dkt.

96), I discovered that the following statement by the State Defendants was inadvertently omitted from my declaration.

2. Minnesota Operation Safety Net (@MinnesotaOSN) (hereinafter “OSN”) is “[t]he official source of public safety information for the trial of former Minneapolis police officer Derek Chauvin.” *See* OSN Twitter 9. It provided official updates from Minnesota law enforcement officials during the Daunte Wright protests on Twitter.

- a. On April 14, 2021, at 12:22 a.m., OSN tweeted a quote from Minnesota State Patrol Col. Matt Langer: ““We are prepared and we will be back tomorrow.”” (Tweet *available at* <https://twitter.com/MinnesotaOSN/status/1382202665950715904>).

3. Additionally, mere hours after Plaintiffs filed their Motion for a Temporary Restraining Order (Dkt. 94), I collected for the Court’s consideration the following relevant information in support of Plaintiffs’ motion, but which was not available to Plaintiffs prior to filing.

4. Lauren Blanchard (@LaurenBlanch12) is a national media correspondent for Fox News. She attended and documented her experience as press during the Daunte Wright protests on Twitter.

- a. On April 14, 2021, at 10:21 p.m., Ms. Blanchard tweeted, “My crew and I were ordered out of cars and to the ground by police.” (Tweet *available at* <https://twitter.com/LaurenBlanch12/status/1382534601462185984>). She continued, “They took photos of all of our credentials. After about 5

mins they let us back into our cars and let us leave. . . . We were not only media crew stopped[.]” *Id.*

- b. On April 14, 2021, at 10:32 p.m., Ms. Blanchard posted a video capturing part of the above-described encounter, captioned, “Partial video of my crew and I as we tried to leave the area. Police had blocked everyone in. We were ordered on our knees – hands up. They took pics of all our IDs.” (Tweet *available at* <https://twitter.com/LaurenBlanch12/status/1382537312953860100>).
- c. On April 14, 2021, at 10:52 p.m., Ms. Blanchard tweeted, “As a reminder – the curfew put in place by the Mayor of Brooklyn Center had media exempt. We were scolded by the law enforcement checking our IDs that we were not supposed to be there.” (Tweet *available at* <https://twitter.com/LaurenBlanch12/status/1382542234462093312>).

5. Unicorn Riot (@UR_Ninja), a non-profit media organization, attended and documented their experiences as press during the Daunte Wright protests on Twitter.

- a. On April 15, 2021, at 12:07 a.m., Unicorn Riot tweeted, “Our reporter Niko was just detained by police but was released.” (Tweet *available at* https://twitter.com/UR_Ninja/status/1382561107307560968).
- b. On April 15, 2021, at 12:31 a.m., Unicorn Riot tweeted, “The officers who detained Niko took his microphone out of his hand and threw it into some trees where he found it after being released. It appears officers took the mic lapel flap as a souvenir because it was gone from the mic when it

was recovered.” (Tweet *available at* https://twitter.com/UR_Ninja/status/1382567290663809024).

c. On April 15, 2021, at 12:34 a.m., Unicorn Riot tweeted, “Another reporter who was taken by police and then released also picked up what they called ‘scraps’ various cords and parts of their gear that they recovered scattered on the side of the street and in the grass.” (Tweet *available at* https://twitter.com/UR_Ninja/status/1382567872547987461).

d. On April 15, 2021, at 1:09 a.m., Unicorn Riot posted three images, captioned “This is the state that equipment belonging to our reporter as well as other media was left in by officers who arrested and harassed journalists only to release them a few mins later. @thenbhdreporter’s microphone was broken into several pieces.” (Tweet *available at* https://twitter.com/UR_Ninja/status/1382576839151996928).

6. On April 15, 2021, at 12:27 a.m., OSN tweeted an update, “@MnDPS_MSP [Minnesota State Patrol] Col. Matt Langer says law enforcement have refined a process to quickly ID credentialed members of the media who get wrapped up in events to work with them quickly so they can get back to their jobs. ‘We want media there covering these events,’ he said.” (Tweet *available at* <https://twitter.com/MinnesotaOSN/status/1382566138211602440>).

Dated: April 14, 2020

/s/Isabella Salomão Nascimento

Isabella Salomão Nascimento